

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HERMÈS INTERNATIONAL, and :  
HERMÈS OF PARIS, INC., :

Plaintiffs, :

v. :

JOHN DOE 1 A/K/A LI HUA A/K/A :  
YAO DONG; JOHN DOE 2 A/K/A :  
HAO DA TOU A/K/A DA TOU LI :  
A/K/A HUWEISHENG :  
A/K/A GOU YI LU; :  
JOHN DOE 3 A/K/A LUOXIAOBO :  
A/K/A LIU MIAN A/K/A ZHEN :  
HONGXING A/K/A LIANGGUILIN :  
A/K/A LUO DA YOU A/K/A GAOHONG; :  
JOHN DOE 4 A/K/A JIU MA; :  
JOHN DOE 5 A/K/A CHEN YIBIN :  
A/K/A LEONA WANGQIANG; :  
JOHN DOE 6 A/K/A IAAI A/K/A :  
JKUOIU; :  
JOHN DOE 7 A/K/A XIN HONG; :  
JOHN DOE 8 A/K/A ZHENG RUISHAN; :  
JOHN DOES 9-100; :  
AND XYZ COMPANIES, :

Defendants. :

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Civil Action

No.: 12 Civ. 1623

**JUDGE COTE**

**MOTION FOR ENTRY OF DEFAULT  
JUDGMENT AGAINST ALL  
DEFENDANTS**

Plaintiffs Hermès International, a French corporation and Hermès of Paris, Inc., a New York corporation (“Hermès of Paris”) (collectively, “Hermès” or “Plaintiffs”), by their counsel THE GIOCONDA LAW GROUP PLLC, hereby requests an entry of a default by the Court against the defendants, John Doe 1 a/k/a Li Hua a/k/a Yao Dong, John Doe 2 a/k/a Hao Da Tou a/k/a Da Tou Li a/k/a Huweisheng a/k/a Gou Yi Lu, John Doe 3 a/k/a Luoxiaobo a/k/a Liu Mian a/k/a Zhen Hongxing a/k/a Liangguilin a/k/a Luo Da You a/k/a Gaohong, John Doe 4 a/k/a Jiu Ma, John Doe 5 a/k/a Chen YiBin a/k/a Leona Wangqiang, John Doe 6 a/k/a Iaai a/k/a Jkuoiu, John Doe 7 a/k/a Xin Hong; John Doe 8 a/k/a Zheng Ruishan, John Does 9-100, and XYZ Companies (collectively, “Defendants”), pursuant to FED. R. CIV. P. 55(b)(2) and Local Civil Rule 55.2(b), and states as follows:

1. This Court issued summons in the names of the Defendants on March 6, 2012.
2. Pursuant to the terms of the Temporary Restraining Order, Seizure Order, Asset Restraining Order, Domain Name Transfer Order, Order for Expedited Discovery, Order Permitting Service by Electronic Mail, and Order to Show Cause for Preliminary Injunction, entered by the Court on March 6, 2012 (Docket No. 3) the Plaintiffs served each of the Defendants via electronic mail on March 8, 2012.
3. Accordingly, the Defendants’ answer to the Complaint was due on March 29, 2012.
4. As of today no Defendant has answered, nor has any Defendant requested an extension of time in which to answer, nor has any counsel made an appearance on any of the Defendants’ behalf. Counsel for Plaintiffs has reviewed the docket in this matter as evidenced by the Affidavit of Joseph C. Gioconda, Esq., submitted in support of Plaintiffs’ Motion for Entry of Default Judgment Against All Defendants.

5. To the best of Plaintiffs' knowledge, the Defendants are neither infants nor incompetent persons, and are not members of the United States Military, and are not eligible for the special protections afforded these classes under Fed. R. Civ. P. 55(b)(2) and the Soldiers' and Sailors' Civil Relief Act of 1940 respectively.

6. The Plaintiffs will serve a copy of their Motion for Entry of Default Judgment Against All Defendants and supporting evidence in the same manner as prescribed by the Court in its previous Orders on or before April 16, 2012.

WHEREFORE, Plaintiffs request that a default judgment be entered against all Defendants.

April 13, 2012

Respectfully Submitted,

/s/ Joseph C. Gioconda

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*HERMÈS INTERNATIONAL and  
HERMÈS OF PARIS, INC.*